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January 13, 2022

Via ECF

The Honorable Kenneth M. Karas
United States District Court Judge
U.S. District Court, Southern District of New York
300 Quarropas Street
White Plains, New York 10601

MEMO ENDORSED

Re: *W.S.R., An Infant By And Through His Father William Richardson, and William Richardson And Nicole Richardson, Individually v. FCA US LLC, Yanfeng US Automotive Interior Systems I LLC (a/k/a Yanfeng Automotive Interior Systems), Adient, Plc, et al.*
Docket No. 7:18-cv-06961-KMK-AEK

Dear Judge Karas:

We represent Defendant FCA US LLC (“FCA”). This letter is submitted pursuant to Rule IX.A. of the Court’s Individual Practices concerning confidential documents submitted as Exhibits to FCA’s Opposition to Adient Plc’s (“Adient”), Johnson Controls Inc.’s (JCI’s) and JCIM LLC’s (JCIM’s) Motion for Summary Judgment.

FCA US previously moved to seal documents attached to FCA’s Motion for Summary Judgment which was granted by the Court on November 10, 2021. (Dkt. No. 261).

FCA subsequently moved to seal additional documents on December 22, 2021 in opposition to Summary Judgment Motions filed by the Plaintiffs and by Defendant Yanfeng Automotive Interior Systems (“YFAI”) which was granted by the Court on January 3, 2022 (Dkt. No. 288).

FCA US is now filing duplicate confidential documents as Exhibits in opposition to the Adient, JCI and JCIM Summary Judgment Motions for the same reasons previously set forth in the prior letter motions and Declarations of Dave Valley in support.

To the extent necessary, we request that the Court permit us to file as sealed these duplicate confidential Exhibits filed under seal pursuant to the prior Orders of the Court.

AFFILIATES

LIVINGSTON, NEW JERSEY

BUCHAREST, ROMANIA

LOS ANGELES, CALIFORNIA

HERZFELD + RUBIN
PC

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Additionally, we wish to advise Your Honor that defendants YFAI and Adient have advised that they wish to have us file certain exhibits (which are from their productions or relate to their deposition testimony) under seal. Those defendants will be making their own applications concerning these Exhibits.

Respectfully submitted,

Maureen Doerner Fogel

Maureen Doerner Fogel (MDF-0989)

cc: All counsel via ECF

Granted.

SO ORDERED


KENNETH M. KARAS U.S.D.J.

January 20, 2022